UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

AMERICAN INTERNATIONAL GROUP, INC., et al.,))
Plaintiffs,) Case No. 07 CV 2898
v. ACE INA HOLDINGS, INC., et al.,)) Judge Robert W. Gettleman)) Magistrate Judge Sidney I. Schoolsier
Defendants	Magistrate Judge Sidney I. Schenkier
LIBERTY MUTUAL INSURANCE COMPANY, et al.,)))
Counter-Claimants,))
v.))
AMERICAN INTERNATIONAL GROUP, INC., et al.,)))
Counter-Defendants.))
SAFECO INSURANCE COMPANY OF AMERICA and OHIO CASUALTY INSURANCE COMPANY, individually, and on behalf of a class consisting of members of the National Workers Compensation Reinsurance)) Case No. 09 CV 2026) Judge Robert W. Gettleman
Pool, Plaintiff,) Magistrate Judge Sidney I. Schenkier
V.))
AMERICAN INTERNATIONAL GROUP, INC., et al.,)))
Defendants.	<i>)</i>)

NOTICE OF MOTION

To: All Counsel of Record

PLEASE TAKE NOTICE that on Tuesday, January 25, 2011, at 9:15 a.m., we shall appear before the Honorable Robert W. Gettleman or any judge sitting in his stead in Room 1703 of the United States District Courthouse, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the CLASS PLAINTIFFS' MOTION FOR ORDER DIRECTING INTERVENORS TO PERMIT THEM TO PARTICIPATE IN SETTLEMENT NEGOTIATIONS AND JOINDER IN LIBERTY MUTUAL'S MOTION REQUESTING IDENTICAL RELIEF, a copy of which is hereby served upon you.

Dated: January 20, 2011 Respectfully submitted,

SAFECO INSURANCE COMPANY OF AMERICA AND OHIO CASUALTY INSURANCE COMPANY

By: s/ Matthew O. Sitzer
One of their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on January 20, 2011, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** to be filed with the Clerk of the Court and served using the CM/ECF e-filing system upon all counsel of record.

> s/ Matthew O. Sitzer _ Matthew O. Sitzer